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IN THE MATTER OF ELECTRIC VEHICLES,
EV INFRASTRUCTURE AND THE
ELECTRIFICATION OF THE TRANSPORTATION
SECTOR IN ARIZONA

Docket No. E-00000A-21-0104

Comments and Amendments of the Arizona
PIRG Education Fund, Southwest Energy
Efficiency Project, and Western Resource
Advocates on the Joint Utility Transportation
Electrification Plan

**Comments and Amendments of the Arizona PIRG Education Fund,
Southwest Energy Efficiency Project, and Western Resource Advocates on the
Joint Utility Transportation Electrification Plan**

The Arizona PIRG Education Fund, the Southwest Energy Efficiency Project (SWEEP), and Western Resource Advocates (WRA) are pleased to provide the attached amendments to the Commission Staff Recommended Opinion and Order on the joint utility Transportation Electrification Plan.

These amendments direct Arizona Public Service Company, Tucson Electric Power, and UNS Electric to:

1. Implement the Plan's "high adoption" electric vehicle scenario in order to maximize reductions to customer rates and avoid the consequences of a nonattainment designation for ground-level ozone;
2. File transportation electrification plans at least triennially beginning on June 1, 2022;
3. Report out on key metrics as a component of future semi-annual and annual reports; and
4. File a budget associated with the implementation of the approved Plan.

Thank you for the consideration of our comments.

Diane E. Brown
Executive Director
Arizona PIRG Education Fund

Adam Stafford
Senior Staff Attorney
WRA

Ellen Zuckerman
Utility Program Director
SWEEP

ARIZONA PIRG EDUCATION FUND, SWEEP & WRA EXCEPTION NO. 1

TIME/DATE PREPARED: _____

COMPANY: Arizona Corporation Commission

AGENDA ITEM NO.: _____

DOCKET NO.: E-000000A-21-0104

OPEN MEETING: _____

Purpose: To direct APS, TEP, and UNS Electric to implement electric vehicle programs and investments in alignment with the Transportation Electrification Plan's "High Adoption Scenario" in order to maximize reductions to customer rates and avoid the consequences of a nonattainment designation for ground-level ozone.

At Page 9, Line 7, after "reports" DELETE:

"by January 15 and June 15 of each year."

At Page 9, Line 7 INSERT NEW FINDING OF FACT:

"16. However, recognizing the significant benefits of increased transportation electrification to reduce customer electric rates and avoid the consequences of a nonattainment designation for ground-level ozone, the Commission approves the plan and associated programs and budgets to achieve the "High Adoption Scenario."

At Page 9, Lines 19-21, after "approved" INSERT:

"to achieve the plan's High Adoption Scenario"

**** MAKE CONFORMING CHANGES**

ARIZONA PIRG EDUCATION FUND, SWEEP & WRA EXCEPTION NO. 2

TIME/DATE PREPARED: _____

COMPANY: Arizona Corporation Commission

AGENDA ITEM NO.: _____

DOCKET NO.: E-00000A-21-0104

OPEN MEETING: _____

Purpose: To direct each investor-owned utility to file transportation electrification implementation plans at least every three years beginning on June 1, 2022; to ensure that those plans, at a minimum, include programs that serve all main customer segments, address key barriers to electric vehicle adoption, and are developed with the input of stakeholders; and to establish principles to guide future plan development.

At Page 10, Line 4, INSERT NEW ORDERING PARAGRAPH:

"IT IS FURTHER ORDERED that beginning on June 1, 2022, and at a minimum every three years thereafter, Tucson Electric Power Company, UNS Electric, Inc., and Arizona Public Service Company shall each file a new transportation electrification implementation plan for review and approval by the Commission within 180 days. Plans shall be developed with the input of a stakeholder collaborative that meets at least quarterly and, at a minimum, shall include programs and associated budgets to address key barriers to electric vehicle adoption and that provide offerings to serve low-income customers, single-family dwellings, multi-family dwellings, commercial customers, industrial customers, public highway corridors, and public fleets. At a minimum, plans should anticipate and prepare for the achievement of the "High Adoption Scenario" described in the 2021 plan. The plans proposed by the utilities, as a whole, shall be designed to:

1. Provide benefits to electric utility ratepayers and electric vehicle drivers,
2. Improve the electrical system's efficiency, the integration of variable resources, the system's operational flexibility, and utilization of the system during off-peak hours,
3. Increase access to the use of electricity as a transportation fuel, including among hard-to-reach customer segments and markets,
4. Spur innovation, competition, and increased consumer choices in transportation electrification and related infrastructure and services,
5. Contribute to meeting air quality standards and minimizing air emissions, including greenhouse gases.
6. Foster private market investment,
7. Provide for sufficient stakeholder engagement and public reporting,
8. Educate electric utility ratepayers on the benefits of electrified transport, and
9. Be reasonable and prudent, as determined by the Commission.

**** MAKE CONFORMING CHANGES**

ARIZONA PIRG EDUCATION FUND, SWEEP & WRA EXCEPTION NO. 3

TIME/DATE PREPARED: _____

COMPANY: Arizona Corporation Commission

AGENDA ITEM NO.: _____

DOCKET NO.: E-00000A-21-0104

OPEN MEETING: _____

Purpose: This amendment clarifies the reporting requirements for Tucson Electric Power, UNS Electric, and Arizona Public Service Company's semi-annual and annual reports on their transportation electrification programs and initiatives. It also changes the deadline for annual and semi-annual reports to March 15th and September 15th, respectively, to better align with the utility reporting timeframe for demand-side management programs and to ensure that utilities have a full program's year worth of data to report on in their filings.

At Page 9, Line 7, DELETE "by January 15 and June 15 of each year"

At Page 10, Line 3, DELETE "January" and replace with "March"

At Page 10, Line 3, DELETE "June" and replace with "September"

At Page 10, Line 3, after "each year." INSERT:

"At a minimum, as applicable, these reports shall provide a commensurate level of detail as provided by each utility in their semi-annual and annual demand-side management reports and shall incorporate any program plan updates that the utilities intend to institute. In these reports, Tucson Electric Power Company, UNS Electric, Inc., and Arizona Public Service Company shall also make all reasonable efforts to report on their progress relative to the Participation, Environmental, and Economic metrics established in the plan. "

**** MAKE CONFORMING CHANGES**

ARIZONA PIRG EDUCATION FUND, SWEEP & WRA EXCEPTION NO. 4

TIME/DATE PREPARED: _____

COMPANY: Arizona Corporation Commission

AGENDA ITEM NO.: _____

DOCKET NO.: E-00000A-21-0104

OPEN MEETING: _____

Purpose: This amendment directs Tucson Electric Power, UNS Electric, and Arizona Public Service to file a budget associated with the approval of its transportation electrification plan.

At Page 10, Line 4, INSERT NEW ORDERING PARAGRAPH:

"IT IS FURTHER ORDERED that within 120 days of this decision Tucson Electric Power Company, UNS Electric, Inc., and Arizona Public Service Company shall each file a budget for each of the approved programs discussed herein."

**** MAKE CONFORMING CHANGES**